

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD MAY 1, 2023 THROUGH MAY 31, 2023**

Debtor: LTL Management LLC

Applicant: Wollmuth Maher & Deutsch LLP

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition  
Date")

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**SECTION 1  
FEE SUMMARY**

X Monthly Fee Statement No. 2                      or    ☐ Final Fee Application

Summary of Amounts Requested for the Period from May 1, 2023 through May 31, 2023 (the "Second Statement Period").

Total Fees:	\$433,091.00
Total Disbursements:	\$5,001.14
Total Fees Plus Disbursements:	\$438,092.14
Minus 20% Holdback of Fees:	\$86,618.20
Amount Sought at this Time:	\$351,473.94

	<u>FEEs</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>\$371,261.00</u>	<u>\$2,348.76</u>
Total Fees Allowed to Date:	<u>\$0</u>	<u>\$0</u>
Total Retainer (If Applicable):	<u>\$0</u>	<u>\$0</u>
Total Holdback (If Applicable):	<u>\$74,252.20</u>	<u>\$0</u>
Total Received by Applicant:	<u>\$0</u>	<u>\$0</u>

<b>Name of Professional &amp; Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate</b>	<b>Fees</b>
Paul R. DeFilippo, Esq., Partner	1978	74.9	\$975	\$70,443.75
James N. Lawlor, Esq., Partner	1992	127.5	\$910	\$116,025.00
Lyndon M. Tretter, Esq., Partner	1986	2.0	\$910	\$1,820.00
Nicole C. Rende, Esq., Associate	2019	19.4	\$635	\$12,319.00
Joseph F. Pacelli, Esq., Associate	2020	175.9	\$635	\$109,855.00
Logan R. Leonard, Esq., Associate	2022	118.9	\$440	\$52,316.00
Stephanie A. Weaver, Esq., Associate	2023	137.0	\$440	\$59,796.00
Scarlet E. Meltzer, Paralegal	N/A	21.8	\$235	\$5,123.00
Celeyndiana Rodriguez, Paralegal	N/A	0.8	\$235	\$188.00
Alexander T. Cukier, Paralegal	N/A	21.4	\$235	\$4,288.75
Michele Klinger, Paralegal	N/A	3.9	\$235	\$916.50

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0
b) <b>Asset Disposition:</b> Sales, leases, abandonment and related transaction work.	0	0
c) <b>Avoidance Action Litigation:</b> Preference and fraudulent transfer litigation.	0	0
d) <b>Business Operations:</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	0
e) <b>Case Administration:</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	154.3	\$85,297.50
f) <b>Claims Administration and Objections:</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.8	\$550.50
g) <b>Employee Benefits/Pensions:</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0
h) <b>Fee/Employment Applications:</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	111.6	\$64,158.50
i) <b>Fee/Employment Objections:</b> Review of an objections to the employment and fee applications of others.	6.0	\$3,924.50
j) <b>Financing:</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0	0
k) <b>Litigation:</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	319.5	\$215,834.00
l) <b>Meeting of Creditors:</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	20.7	\$11,712.00

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEES</b>
<b>m) Plan and Disclosure Statement:</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	70.6	\$44,161.00
<b>n) Relief from Stay Proceedings:</b> Matters relating to termination or continuation of automatic stay under 362.	2.6	\$2,287.50
<b>o) Accounting/Auditing:</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0	0
<b>p) Business Analysis:</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0
<b>q) Corporate Finance:</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0
<b>r) Data Analysis:</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0
<b>s) Litigation Consulting:</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0
<b>t) Reconstruction Accounting:</b> Reconstructing books and records from past transactions and bringing accounting current.	0	0
<b>u) Tax Issues:</b> Analysis of tax issues and preparation of state and federal tax returns.	0	0
<b>v) Valuation:</b> Appraise or review appraisals of assets.	0	0
<b>w) Travel Time</b>	17.4	\$5,165.50
<b>SERVICE TOTALS</b>	<b>703.5</b>	<b>\$433,091.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
04/11/2023 - ATC - Local Travel	\$337.51
04/19/2023 - FedEx shipping charge for documents sent to USDC	\$30.47
05/03/2023 - JFP - Travel from Court on 5/3 (46.8 mi. * \$0.34)	\$15.91
05/03/2023 - PHV payment of 1 attorney to Lawyer's Fund	\$239.00
05/03/2023 - PHV admission payment of 1 attorney	\$150.00
05/03/2023 - ATC - Local Travel	\$329.39
05/03/2023 - JFP - Parking at Court	\$12.00
05/03/2023 - JFP - Travel to Court on 5/3 (46.8 mi. * \$0.34)	\$15.91
05/03/2023 - ATC - Dunkin run before LTL hearing	\$38.55
05/03/2023 - ATC - Dunkin run before LTL hearing	\$22.38
05/04/2023 - J & J Court Transcribers inv # 2023-00923 Transcript	\$1,040.60
05/05/2023 - JNL - Late Night Meal	\$11.10
05/09/2023 - J & J Court Transcribers inv # 2023-00972 Transcript	\$919.60
05/09/2023 - ATC - Travel (NYC to Trenton, NJ)	\$324.75
05/09/2023 - JFP - Travel from Court on 5/9 (46.8 mi. * \$0.34)	\$15.91
05/09/2023 - JFP - Travel to Court on 5/9 (46.8 mi. * \$0.34)	\$15.91
05/09/2023 - JFP - Parking at Court	\$12.00
05/15/2023 - J & J Court Transcribers inv # 2023-01003 Transcript	\$350.90
05/17/2023 - J & J Court Transcribers inv # 2023-01048 Transcript	\$744.15
05/31/2023 - J & J Court Transcribers inv # 2023-01136 Transcript	\$375.10
<b>DISBURSEMENTS TOTALS</b>	<b>\$5,001.14</b>

## SECTION IV CASE HISTORY

1. Date of Retention: June 14, 2023, effective as of April 4, 2023 [Dkt. 770] (the “Retention Order”).<sup>1</sup>
2. Summary explaining the nature of the work performed and the results achieved:
  - Facilitated the drafting, finalization and filing of several documents, including: (i) letters to Judge Kaplan regarding discovery and scheduling issues, (ii) motion regarding procedures for interim compensation, (iii) supplemental declaration regarding plan support agreements and motion to seal, (iv) periodic report regarding value, operations, and profitability of related entities, (v) 13 applications for retention of professionals to the Debtor and supplemental certifications in support of retention applications, (vi) schedules and statement of financial affairs, (vii) objection to and cross-motion for protective order, (viii) omnibus reservations of rights and limited objection with respect to the TCC professionals’ retention applications, (ix) objection to motion to de-designate exhibit A of the term sheet and omnibus response to objections to Debtor's confidentiality designations, (x) objection to motion to compel discovery, (xi) chapter 11 plan and disclosure statement, (xii) objection to motion to compel unredacted documents, (xiii) reply in support of motion regarding disclosure statement deadlines, (xiv) applications to shorten time, (xv) opposition to cross-motion to suspend the case, (xvi) motion regarding ACH expense reimbursement agreement, (xvii) motions to compel the TCC and identified plaintiffs to supplement certain responses to interrogatories and requests for production, (xviii) objection to motions to dismiss, (xix) hearing agendas, (xx) monthly operating report, (xxi) objection to motions for an order certifying direct appeal of preliminary injunction order to the Third Circuit, and (xxii) motion for a bridge order regarding the automatic stay;
  - Analyzed issues and counseled the Debtor with respect to, among other things, (i) retention of the Debtor’s professionals, (ii) recently opened chapter 11 case and adversary proceeding, (iii) mediation, (iv) meeting of creditors and (v) discovery;
  - Participated in the hearings and conferences held during this period, and counseled the Debtor with respect thereto;
  - Monitored main case and adversary proceeding dockets; and

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<sup>1</sup> The Retention Order is attached hereto as Exhibit A.

- Interfaced on a daily basis with the Debtor and/or its other professionals to facilitate the Debtor's administrative processes, including adherence to the local bankruptcy rules and filing procedures.

I certify under penalty of perjury that the above is true.

Date: July 12, 2023

/s/ Paul R. DeFilippo  
Paul R. DeFilippo